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Attorneys for Defendant
Mr. Trejo

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) Case No. 2:24-cr-69-TLN-1
Plaintiff,)
vs.) STIPULATION AND ORDER TO CONTINUE
MANUEL TREJO.) STATUS CONFERENCE AND EXCLUDE TIME
Defendants.)
) Date: February 6, 2025
) Time: 9:30 a.m.
) Judge: Hon. Troy L. Nunley

IT IS HEREBY STIPULATED and agreed by and between Acting United States Attorney Michele Beckwith, through Assistant United States Attorneys Emily Grace Sauvageau and Matthew de Moura, counsel for Plaintiff; and Federal Defender Heather Williams, through Assistant Federal Defender Hootan Baigmohammadi, counsel for Defendant Manuel Trejo that the Status Conference currently set for February 6, 2025 at 9:30 be continued to April 10, 2025 at 9:30 a.m.

The parties specifically stipulate as follows:

1. By previous order, this matter was set for a Status Conference to be held on February 6, 2025, at 9:30 a.m.
2. Mr. Trejo moves for the Status Conference to be continued to April 10 2025 at 9:30 a.m.

3. To date, the government has produced 96 pages, 59 videos, and 12 audio files in discovery. It made an offer to Mr. Trejo on January 27, 2025.
4. Mr. Trejo requires additional time to review the discovery; investigate and research possible defenses; research potential pretrial motions; explore potential resolutions to the case; and otherwise prepare for trial
5. Mr. Trejo believes that failure to grant the requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
6. The government does not object to the continuance request.
7. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial Act), the parties request that the time period between February 6, 2025 and April 10, 2025, inclusive, be deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance granted by the Court at the defense's request, based on a finding that the ends of justice served by granting the continuance outweighs the best interest of the public and in a speedy trial.

Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

Date: January 31, 2025

/s/ Hootan Baigmohammadi
HOOTAN BAIGMOHAMMADI
Assistant Federal Defender
Attorneys for Mr. Trejo

Date: January 31, 2025

MICHELE BECKWITH
Acting United States Attorney

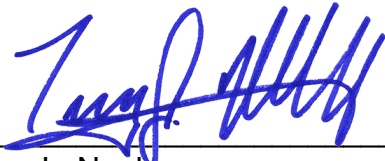
/s/ Emily G. Sauvageau
Emily G. Sauvageau
Assistant United States Attorney
Attorneys for Plaintiff

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: February 3, 2025



Troy L. Nunley
Chief United States District Judge